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***Via E-File and Hand Delivery***

The Honorable Gregory M. Sleet  
United States District Court  
844 North King Street, Lock Box 19  
Wilmington, DE 19801

RE: Hartz v. Fager, Civil Action No. 04-877 (GMS)

Dear Judge Sleet:

I am local counsel for the Plaintiffs in the above matter. Pursuant to the Court's March 14, 2005 Scheduling Order, Plaintiffs' expert discovery deadline is September 1, 2005, Defendant's expert discovery deadline is October 1, 2005, and all discovery shall be completed by November 1, 2005. I am writing to request a 30-day extension of these deadlines and enclose for the Court's approval a Stipulation in this regard signed by all counsel.

I make this request for the following reason: This case is scheduled for a mediation conference with Magistrate Thyne on September 1, 2005. In order to meet the September 1st expert deadline, Plaintiffs would have to incur additional costs to obtain final reports from their treating doctors. By extending the expert deadline for 30 days (to October 1, 2005), Plaintiffs would be able to delay these additional costs and increase the chances of settlement.

Thank you for your consideration of this matter.

Respectfully,



Kevin A. Guerke, Esq. (DE #4096)

KAG:cde  
Enclosure

cc: Richard M. Wiener, Esq.  
Michael A. Pedicone, Esq.